

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INFORMATION

Plaintiff,

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

v.

18 U.S.C. § 2253(a)

18 U.S.C. § 2422(b)

BRANDON MARK BJERKNES,

18 U.S.C. § 2427

18 U.S.C. § 2428

Defendant.

CR 17-234 WMW

THE ACTING UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(Coercion and Enticement)

On or about September 5, 2016, in the State and District of Minnesota, the defendant,

BRANDON MARK BJERKNES,

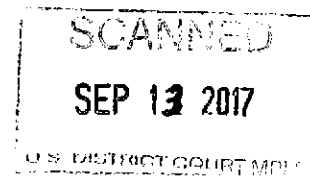
did use a facility and means of interstate and foreign commerce, that is, the Internet, to knowingly persuade, induce, and entice Minor #1, a known 13-year old girl, to engage in sexual activity for which a person can be charged with a criminal offense, namely, the production of child pornography, in violation of 18 U.S.C. § 2251(a), all in violation of Title 18, United States Code, Sections 2422(b) and 2427.

COUNT 2

(Production of Child Pornography)

On or about March 12, 2017, in the State and District of Minnesota, the defendant,

BRANDON MARK BJERKNES,



did, knowingly employ, use, persuade, induce, and entice Minor #2, a known 12-year old girl, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including, but not limited to the following computer video file: IMG_6330.MOV, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of, and in and affecting interstate and foreign commerce, and which visual depiction was transmitted using a means and facility of, and in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

FORFEITURE ALLEGATIONS

Counts 1 through 2 of this Information are hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 2253(a) and 2428.

As a result of the foregoing offenses, the Defendant shall forfeit to the United States pursuant to Title 18, United States Code, Sections 2253(a) and 2428:

- (a) Any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110, United States Code;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including, but not limited to:

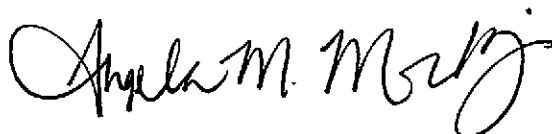
1. One white Apple iPhone 6S, FCC ID BCG-E2946A;
2. One black Apple iPhone 6S, FCC ID BCG-E2946A; and
3. One 27-inch Apple iMac, serial number QPO32ODPDNP.

All in violation of Title 18, United States Code, Section 2253(a) and 2428.

Dated:

9/13/17

GREGORY G. BROOKER
Acting United States Attorney



BY: ANGELA MUNOZ-KAPHING
Assistant U.S. Attorney
Attorney ID No. 389207